

1 EDMUND G. BROWN JR., Attorney General  
of the State of California  
2 ALFREDO TERRAZAS  
Senior Assistant Attorney General  
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4 California Department of Justice  
1300 I Street, Suite 125  
5 P.O. Box 944255  
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6 Telephone: (916) 324-5339  
Facsimile: (916) 327-8643

7 Attorneys for Complainant  
8

9 **BEFORE THE**  
10 **BOARD OF REGISTERED NURSING**  
11 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

13 **AMANDA LASCHET, AKA**  
14 **AMANDA LYNN MOYA**  
2326 Catalina Circle #377  
Oceanside, CA 92056  
15 and  
09 Timothy Drive  
16 Los Lumas, NM 87031

17 Registered Nurse License No. 610150

18 Respondent.  
19

Case No. 2007-261

OAH No. 2008010412

**DEFAULT DECISION**  
**AND ORDER**  
[Gov. Code, §11520]

20 **FINDINGS OF FACT**

21 1. On or about April 10, 2007, Complainant Ruth Ann Terry, M.P.H., R.N.,  
22 in her official capacity as the Executive Officer of the Board of Registered Nursing, Department  
23 of Consumer Affairs, filed Accusation No. 2007-261 against Amanda Laschet, also known as  
24 Amanda Lynn Moya ("Respondent") with the Board of Registered Nursing ("Board").

25 2. On or about December 3, 2002, the Board issued Registered Nurse License  
26 Number 610150 to Amanda Lynn Moya, also known as Amanda Laschet ("Respondent"). The  
27 registered nurse license will expire on September 30, 2008, unless renewed.

28 ///

1                   3.       On or about April 18, 2007, Carol L. Sekara, an employee of the Office of  
2 the Attorney General, served by Certified Mail and by First Class Mail a copy of Accusation No.  
3 2007-261, Statement to Respondent, Notice of Defense, Discovery Statutes and Disciplinary  
4 Guidelines to 09 Timothy Drive, Los Lumas, NM 87031, Respondent's address of record with the  
5 Board. A copy of the Accusation, the related documents, and Declaration of Service are attached  
6 as **Exhibit A**, and are incorporated herein by reference.

7                   4.       Service of the Accusation was effective as a matter of law under the  
8 provisions of Government Code section 11505, subdivision (c).

9                   5.       On or about April 24, 2007, Respondent returned to the Board a Notice of  
10 Defense, requesting a hearing, and providing Respondent's mailing address, as follows:  
11 "2326 Catalina Circle #377, Oceanside, CA 92056".

12                   6.       On or about January 29, 2008, Carol L. Sekara served by Certified Mail and  
13 by First Class Mail a copy of Notice of Hearing pursuant to Government Code section 11509, for  
14 an administrative hearing set on March 14, 2008, at 9:00 a.m., in the Matter of Accusation  
15 No. 2007-261, to Respondent at 2326 Catalina Circle #377, Oceanside, CA 92056. Respondent  
16 failed to appear at the hearing.

17                   7.       California Government Code section 11520(a) states, in pertinent part:

18                             If the respondent either fails to . . . appear at the hearing, the agency may take  
19                             action based upon the respondent's express admissions or upon other evidence and  
                              affidavits may be used as evidence without any notice to respondent.

20                   8.       Pursuant to its authority under Government Code section 11520, the Board  
21 finds Respondent is in default. The Board will take action without further hearing and, based on  
22 Respondent's express admissions by way of default and the evidence before it, contained in **Exhibit**  
23 **A**, finds that the allegations in Accusation No. 2007-261 are true.

24                   9.       The total costs for investigation and enforcement are \$1,420 as of May 26,  
25 2008.

26 ///

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28 ///

**DETERMINATION OF ISSUES**

1. Based on the foregoing findings of fact, Respondent Amanda Laschet, also known as Amanda Lynn Moya, has subjected her Registered Nurse License No. 610150 to discipline.

2. A copy of the Accusation and the related documents and Declaration of Service are attached.

3. The Board has jurisdiction to adjudicate this case by default.

4. The Board is authorized to revoke Registered Nurse License No. 610150, issued to Respondent Amanda Laschet, also known as Amanda Lynn Moya, based upon violation of Business and Professions Code sections 2761, subdivision (a)(4) (revocation of out-of-state nurse license), and 2761, subdivision (a) on the grounds of unprofessional conduct as defined by Business and Professions Code section 2762, subdivision (a) (possession and self administration of methamphetamine, a controlled substance), in the Accusation.


**ORDER**

**IT IS SO ORDERED** that Registered Nurse License No. 610150, heretofore issued to Respondent Amanda Laschet, also known as Amanda Lynn Moya, is revoked.

Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a written motion requesting that the Decision be vacated and stating the grounds relied on within seven days after service of the Decision on Respondent. The Board in its discretion may vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

This Decision shall become effective on September 18/2008.

It is so ORDERED August 18/2008

  
\_\_\_\_\_  
FOR THE BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS

Attachments:

Exhibit A: Accusation No.2007-261, Related Documents and Declaration of Service

03579110-SA2006101938  
Laschet.Default.wpd  
baf[5/26/08]

Exhibit A

Accusation No. 2007-261  
Related Documents and Declaration of Service

1 EDMUND G. BROWN JR., Attorney General  
of the State of California  
2 ALFREDO TERRAZAS  
Senior Assistant Attorney General  
3 ARTHUR D. TAGGART, State Bar No. 83047  
Supervising Deputy Attorney General  
4 California Department of Justice  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 324-5339  
Facsimile: (916) 327-8643

7 Attorneys for Complainant  
8

9 **BEFORE THE**  
10 **BOARD OF REGISTERED NURSING**  
11 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2007-241

13 **AMANDA LASCHET,**  
14 **A.K.A. AMANDA LYNN MOYA**  
09 Timothy Drive  
Los Lumas, NM 87031

**A C C U S A T I O N**

15 Registered Nurse License No. 610150

16 Respondent.  
17

18 Complainant alleges:  
19

20 **PARTIES**

21 1. Ruth Ann Terry, M.P.H., R.N. ("Complainant") brings this Accusation  
22 solely in her official capacity as the Executive Officer of the Board of Registered Nursing  
23 ("Board"), Department of Consumer Affairs.

24 2. On or about December 3, 2002, the Board issued Registered Nurse License  
25 Number 610150 to Amanda Laschet, also known as Amanda Lynn Moya ("Respondent"). The  
26 registered nurse license will expire on September 30, 2008.  
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4. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811(b) of the Code, the Board may renew an expired license at any time within eight years after the expiration.

The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action.

In addition to other acts constituting unprofessional conduct within the meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed under this chapter to do any of the following:

7. Section 4060 of the Code provides, in pertinent part,

No person shall possess any controlled substance, except that furnished to a person upon the prescription of a physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor pursuant to Section 3640.7, or furnished pursuant to a drug order issued by a certified nurse-midwife pursuant to Section 2746.51, a nurse practitioner pursuant to Section 2836.1, a physician assistant pursuant to Section 3502.1, a naturopathic doctor pursuant to Section

1 3640.5, or a pharmacist pursuant to either subparagraph (D) of paragraph (4) of, or  
2 clause (iv) of subparagraph (A) of paragraph (5) of, subdivision (a) of Section  
4052.

3 **COST RECOVERY**

4 8 Section 125.3 of the Code provides, in pertinent part, that the Board may  
5 request the administrative law judge to direct a licensee found to have committed a violation or  
6 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation  
7 and enforcement of the case.

8 **DRUG**

9 "Methamphetamine" is a Schedule II controlled substance as designated by  
10 Health and Safety Code section 11055(d)(2).

11 **FIRST CAUSE FOR DISCIPLINE**

12 (Out-of-State Discipline)

13 9. Respondent's registered nurse license is subject to disciplinary action  
14 under Code section 2761(a)(4) on the grounds of unprofessional conduct in that, effective  
15 February 25, 2006, pursuant to the Findings of Fact, Conclusions of Law and Order No.  
16 0510049, *In the Matter of Professional Nurse License No. RN132552 Issued to: Amanda Lynn*  
17 *Laschet* (attached hereto as **Exhibit A**), the Arizona State Board of Nursing revoked  
18 Respondent's Arizona Professional Nurse License, No. RN132552.

19 **SECOND CAUSE FOR DISCIPLINE**

20 (Possess a Controlled Substance in Violation of law, and Self-Administration)

21 10. Respondent is subject to disciplinary action under Code Section 2761(a),  
22 on the grounds of unprofessional conduct, as defined in Code section 2762(a), in that Respondent  
23 committed acts, as follows:

24 a. On or about May 2, 2005, Respondent possessed methamphetamine, a  
25 controlled substance, in violation of Code section 4060.

26 b. On or about May 2, 2005, Respondent self-administered  
27 methamphetamine, a controlled substance.  
28

**PRAYER**


WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number 610150, issued to Amanda Laschet, also known as Amanda Lynn Moya;

2. Ordering Amanda Laschet, also known as Amanda Lynn Moya, to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Code section 125.3; and

3. Taking such other and further action as deemed necessary and proper.

DATED: 4/10/07

  
RUTH ANN TERRY, M.P.H., R.N.  
Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
Complainant

03579110-SA2006101938  
10323258.wpd  
bc [2/9/07]



## **EXHIBIT A**

ARIZONA STATE BOARD OF NURSING  
1651 East Morten Avenue, Suite 210  
Phoenix, Arizona 85020  
602-889-5150

IN THE MATTER OF PROFESSIONAL NURSE  
LICENSE NO. RN132552  
ISSUED TO:

AMANDA LYNN LASCHET,  
  
Respondent.

CASE NO. 0510049

ORDER DENYING RESPONDENT'S  
MOTION FOR REHEARING

Amanda Laschet ("Respondent") filed a Motion for Rehearing in the above-entitled matter on February 27, 2006. The State filed a Response on March 7, 2006.

On March 20, 2006, after hearing oral arguments of counsel, reviewing and considering Respondent's Motion and the State's Response, the Arizona State Board of Nursing denied Respondent's Motion for Rehearing because Respondent failed to meet the standards established in A.A.C. R4-19-608. For answers to questions regarding the Order Denying Respondent's Motion for Rehearing, contact Susan Barber, R.N., M.S.N., at (602) 889-5161.

This Order constitutes a final administrative decision of the Board which is reviewable by the Superior Court pursuant to A.R.S. §§ 12-901 through 12-914. This decision is binding on Respondent from the date of the Board's denial of the Motion For Rehearing as mandated in A.A.C. R4-19-609 unless and until Respondent secures a Stay Order from Superior Court.

DATED this 20<sup>th</sup> day of March 2006.

SEAL

STATE OF ARIZONA

This is to certify that this is a true and correct  
copy of records on file in this office pertaining  
to Amanda Laschet

ARIZONA STATE BOARD OF NURSING  
SEAL of Joey Ridenour Executive Director

ARIZONA STATE BOARD OF NURSING

Joey Ridenour R.N., M.N.

Executive Director

1 COPIES mailed this 24<sup>th</sup> day of March 2006. by Certified Mail No. 7001 1940 0003 4510 1633 and  
2 First Class Mail to:

3 Amanda Laschet  
4 3999 S Dobson Rd #2048  
5 Chandler AZ 85248

6 COPY mailed this 24<sup>th</sup> day of March 2006, to:

7 Daniel R. Christl  
8 Assistant Attorney General  
9 1275 W. Washington  
10 Phoenix, AZ 85007

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12 Vicky Driver  
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ARIZONA STATE BOARD OF NURSING  
1651 East Morten Avenue, Suite 210  
Phoenix, Arizona 85020-4613

IN THE MATTER OF PROFESSIONAL NURSE  
LICENSE NO. RN132552  
ISSUED TO:

AMANDA LYNN LASCHET,

Respondent.

NOTICE OF BOARD CONSIDERATION  
OF REQUEST FOR REHEARING


DOCKET NO. 0510049

Please be advised that the Arizona State Board of Nursing will consider the Request for Rehearing on March 20, 2006, which begins at 9:00 a.m at the Arizona State Board of Nursing Board Room, Second Floor, 1651 E. Morten Avenue, Suite 210, Phoenix, Arizona 85020. You may appear before the Board in person or through counsel at that time. For answers to questions regarding the Request for Rehearing, contact Susan Barber, R.N., M.S.N., at (602) 889-5161.

DATED THIS 7<sup>th</sup> day of March 2006.

ARIZONA STATE BOARD OF NURSING

SEAL

  
\_\_\_\_\_  
Joey Ridenour, R.N., M.N.  
Executive Director

COPIES mailed this 7<sup>th</sup> day of March 2005, by Certified Mail No. 7003 0500 0003 5814 5317 and First Class Mail to:

Amanda Laschet  
3999 S Dobson Rd #2048  
Chandler AZ 85248

By: Vicky Driver

1 TERRY GODDARD

2 Attorney General

3 Firm Bar No. 14000

4 DANIEL R. CHRISTL

5 Assistant Attorney General

6 State Bar No. 13496

7 1275 W. Washington

8 Phoenix, Arizona 85007

9 Telephone No. (602-542-1610)

10 Attorneys for State of Arizona

11 **ARIZONA STATE BOARD OF NURSING**

12 1651 East Morten Avenue, Suite 210

13 Phoenix, Arizona 85020

14 602-889-5150

15 IN THE MATTER OF PROFESSIONAL NURSE

16 LICENSE NO. RN132552

17 ISSUED TO:

18 **AMANDA LYNN LASCHET,**

19 Respondent.

20 **CASE NO. 0510049**

21 **STATE'S RESPONSE TO REQUEST FOR**  
22 **REHEARING**

23 The State, by and through the undersigned Assistant Attorney General, hereby responds  
24 to Respondent's request for a rehearing and asks that the request be **denied** for the reasons set forth in  
25 the attached Memorandum of Points and Authorities.

26 RESPECTFULLY SUBMITTED this 7<sup>th</sup> day of March 2006.

27 TERRY GODDARD

28 Attorney General

29 

DANIEL R. CHRISTL

Assistant Attorney General

1  
2 **MEMORANDUM OF POINTS AND AUTHORITIES**

3  
4 ***I. PROCEDURAL BACKGROUND***

5 On January 10, 2006, the Board issued a Notice of Charges and mailed it to Respondent's last  
6 known address by regular mail and certified mail, pursuant to A.R.S. § 32-1663(G). No response was  
7 received within 30 days. The Notice alleged Respondent's failure to comply with a CANDO  
8 agreement and relapse addendum. Respondent failed to respond or to request a hearing within 30 days  
9 as required by A.R.S. § 32-1663(G) (3).  
10

11 The Board considered the State's Motion to Deem Allegations Admitted and its recommended  
12 disciplinary action to revoke Respondent's license at its January 25, 2006 meeting. At the meeting, the  
13 Board voted to deem Respondent's admission to the Notice of Charges and revoked Respondent's  
14 license. The Board mailed its Order by regular and certified mail to Respondent's last known address  
15 of record on February 3, 2006. The Board received Respondent's rehearing request on February 23,  
16 2006.  
17

18 ***II. LAW AND ARGUMENT***

19 ***Respondent Failed to State a "Particular Ground" Justifying Rehearing***

20  
21 A.A.C. R4-19-608 (A) explains that a party requesting a rehearing before the Board must  
22 specify the particular grounds for which the rehearing is sought. A.A.C. R4-19-608(B) provides that a  
23 rehearing of the Board's decision may be granted for any of the following enumerated reasons that  
24 materially affect the moving party's rights:  
25

- 26  
27 1. Irregularity in the administrative proceedings of the Board or the administrative law judge,  
28 2. Misconduct of the Board, the administrative law judge, or the prevailing party;  
29 3. Accident or surprise that could not have been prevented by ordinary prudence;

4. Newly discovered material evidence that could not, with reasonable diligence, have been discovered and produced at the original hearing;
5. Excessive or insufficient penalties;
6. Error in the admission or exclusion of evidence or other errors of law occurring during the pendency of the proceeding or at the administrative hearing; or
7. The decision is not justified by the evidence or is contrary to law.

Respondent's request for a rehearing should be denied because of failure to state a "particular ground" as required in A.A.C. R4-19-608. Respondent, without a valid reason, requests the Board to grant a rehearing. Respondent states that she is currently enrolled in a treatment program and under psychiatric care for obsessive compulsive disorder. Respondent provided no explanation for consistent failure to comply with her CANDO agreement, CANDO addendum, and failure to timely respond to the Notice of Charges. Respondent had that opportunity to present the Board with evidence after the Notice of Charges was mailed on November 17, 2005. Respondent failed to respond to this pleading.

Respondent has failed to provide a valid cause for a rehearing as required by law.

#### ***The Revocation of Respondent's License Was Fair***

A disciplinary penalty imposed by an administrative agency is excessive only if it is so disproportionate to the offense, in light of all the circumstances, as to be shocking to one's sense of fairness. *Schillerstrom v. State*, 180 Ariz. 468, 471, 885 P.2d 156, 159 (App. 1994). If the action taken by the agency is within the range of its authority authorized by statute and there is substantial evidence supporting its decision, the Court will not conclude that the action taken by the agency constitutes an abuse of discretion. *Taylor v. Arizona Law Enforcement Merit Systems*, 152 Ariz. 200, 202, 731 P.2d 95, 97 (App. 1987).

Respondent has consistently failed to comply with programs designed to safeguard the public from Respondent's drug problems.

1 Respondent believes that the penalty imposed upon her license, revocation, was too severe.  
2 Respondent is incorrect. Pursuant to A.R.S. § 32-1663 (D), the Board had the statutory authority to  
3 revoke nursing licenses when a nursing practice act violation has been established. In this case, after  
4 failing to respond to the Notice of Charges, the Board lawfully deemed her admission to them,  
5 determined that Respondent had committed multiple nursing practice act violations and revoked her  
6 license. It is not excessive or unfair given the established facts in this case and Respondent's own  
7 admission of lack of responsibility in this area.  
8

9  
10 ***Respondent Received Due Process in this Case and Before this Board***

11 Due process at an administrative agency requires that a party be given a fair trial and fair  
12 tribunal. *Ethridge v. Arizona State Board of Nursing*, 165 Ariz. 97, 106, 796 P.2d 899, 908 (App.  
13 1989), and it primarily requires that rights and property not be taken by a governmental authority  
14 without notice and an opportunity for hearing. The fundamental requirement of due process at an  
15 administrative agency is the *opportunity* to be heard in a meaningful time and in a meaningful manner.  
16 *Comeau v. Arizona State Board of Dental Examiners*, 196 Ariz. 102, 106, 993 P.2d 1066, 1070 (App.  
17 1999).  
18

19 The Board sent Respondent its Notice of Charges on November 17, 2005. The Notice clearly  
20 instructed Respondent to respond within 30 days or the Board would consider the failure an admission  
21 to the charges without conducting a hearing, pursuant to A.R.S. § 32-1663(D). Respondent failed to  
22 respond to the Notice of Charges and failed to respond to the State's Motion to Deem. Respondent  
23 may not like or agree with the Board's decision to revoke her license, but that does not make the  
24 decision illegal and it does not entitle her to a rehearing. *Berenter v. Gallinger*, 173 Ariz. 75, 82, 839  
25 P.2d 1120, 1127 (App. 1992).  
26  
27  
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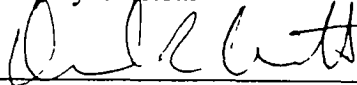
1 Considerable resources were expended to provide proper due process to Respondent. An  
2 opportunity to be heard at a meaningful time was scheduled. Respondent failed to respond as required  
3 by law.  
4

5 **III. CONCLUSION**

6 The Board entered its Order revoking Respondent's license after due consideration of the facts  
7 and circumstances of this case, and in an attempt to protect the public. The revocation of Respondent's  
8 license is lawful. Respondent has failed to present any law or a set of facts that support the Request for  
9 Rehearing. Accordingly, the State requests that the Board **deny** the request for rehearing.  
10

11 RESPECTFULLY SUBMITTED this 7<sup>th</sup> day of March 2006.

12 TERRY GODDARD  
13 Attorney General

14   
15 DANIEL R. CHRISTL  
16 Assistant Attorney General

17  
18 **ORIGINAL** filed this 7<sup>th</sup> day of March 2006, with

19 Arizona State Board of Nursing  
20 1651 East Morten Avenue, Suite 210  
21 Phoenix, AZ 85020

22 **COPIES** mailed this 7<sup>th</sup> day of March 2005, by Certified Mail No. 7003 0500 0003 5814  
23 5317 and First Class Mail to:

24 Amanda Laschet  
25 3999 S Dobson Rd #2048  
26 Chandler AZ 85248

27 By: Vicky Driver  
28  
29

Susan Barber, R.N., M.S.N.  
Arizona State Board Of Nursing  
1651 East Morten, Ste. 210  
Phoenix, Arizona 85020

RECEIVED A.S.B.N.  
06 FEB 27 PM 1:45

February 23, 2006

RE: R.N. 132552

Dear Susan Barber, R.N

I am writing in regards to the decision that was made by the Arizona Board of Nursing. At this time I am filing a motion for rehearing or review of my case. I am currently enrolled in a treatment program for my addiction. I am also under the care of a Psychiatrist for my recent diagnosis of Obsessive Compulsive Disorder. I regret that my lack of responsibility has rendered the consequences that I am dealing with now. I can only hope and pray, that the Board of Nursing would take the time to allow my case to be reheard/reviewed. This is the last chance I have to make things right. I don't want to let myself, my daughters, nor my family down anymore. Your response to this letter would be greatly appreciated. Thank you for your time.

Sincerely,

Amanda Laschet, RN  
3999 S. Dobson Rd #2048  
Chandler AZ, 85248



1 dependency evaluation within 30 days, enroll in a drug screening program within seven days of  
2 entering the CANDO program and submit to required monthly random drug screens, attend two AA  
3 meetings per week, abstain from the use of alcohol and narcotics, abstain from unauthorized drug use,  
4 notify CANDO of any prescription received, notify CANDO of any inability to screen, and upon  
5 return to nursing practice, abide by standard nursing practice restrictions.  
6

7 4. On or about May 2, 2005, Respondent submitted a drug screen that was positive for  
8 methamphetamines.  
9

10 5. On or about May 10, 2005, Board staff interviewed Respondent, who stated that three  
11 days prior to the positive drug screen her husband left her to take a job in South Africa. While going  
12 through some boxes that her husband had packed prior to their move to Arizona, she found the  
13 methamphetamines that she had placed among her clothes several years prior. She said she was  
14 angry with her husband about leaving her in Arizona with their two-year-old daughter. Respondent  
15 admitted to using the methamphetamines and to losing the focus of her recovery.  
16

17 6. Board staff also discussed Respondent's non-compliance with the Stipulated  
18 Agreement, failing to attend two AA/NA meetings per week and attend Nurse Recovery Group  
19 weekly. Respondent stated that she had been hospitalized several times in the previous few weeks for  
20 kidney stones and had been too ill to attend any meetings. Respondent stated that she had her  
21 chemical dependency evaluation conducted on May 3, 2005, but had failed to disclose to the  
22 evaluator that she had relapsed the day before the evaluation.  
23

24 7. On or about May 10, 2005, Respondent signed the relapse addendum, which required,  
25 in part, that she abstain from the use of alcohol and narcotics, undergo a relapse prevention evaluation  
26 within seven days, submit to random drug screens twice per month for six months, attend 90 AA  
27 meetings in 90 days, no access to narcotics for six months and refrain from working in nursing until  
28  
29

1 she receive authorization from the CANDO consultant.

2 8. On or about July 28, 2005, Board staff spoke to Respondent regarding her non-  
3 compliance with the Stipulated Agreement and the relapse addendum. Respondent stated that she did  
4 see the evaluator that conducted the initial evaluation but did not like his recommendations. She  
5 stated that she returned to New Mexico and attended an intensive outpatient program, Focus  
6 Recovery. Board staff also discussed Respondent's failure to notify CANDO that she was unable to  
7 submit to drug screens since she was in New Mexico, had not submitted to two drug screens per  
8 month, and had not started attending the 90 AA/NA meetings in 90 days, all of which were required.  
9 Respondent was asked to submit a letter from Focus Recovery regarding her attendance at the  
10 program, a copy of her medical records for all of her hospitalizations, a letter from her sponsor and  
11 Nurse Recovery Group facilitator that she had discussed her relapse with them and to comply with all  
12 the conditions of the Stipulated Agreement and relapse addendum.  
13  
14  
15

16 9. On or about September 22, 2005, Respondent was scheduled to meeting with Board  
17 staff regarding her non-compliance with the Stipulated Agreement and relapse addendum. On that  
18 day, Respondent called from Belgium, she said her husband was currently in the hospital.  
19 Respondent was due to return to the United States on September 30, 2005, and agreed to contact  
20 Board staff on October 3, 2005.  
21

22 10. On or about October 3, 2005, Respondent failed to contact Board staff.

23 11. On or about October 19, 2005, Board staff left a voice message on Respondent's phone  
24 to contact the Board. Respondent failed to contact Board staff.  
25

26 12. According to CANDO records, Respondent failed to:

- 27 a. submit the Employment Acknowledgement form from her nursing supervisor
- 28 b. notify CANDO and the lab of her inability to submit to drug screens
- 29

1 c. notify CANDO of any hospitalizations or procedures where medications are  
2 administered

3 d. submit performance evaluations for March 2005, April - May 2005 and June-July  
4 2005

5 e. submit Self-Report forms for April - May 2005, June - July 2005, and August -  
6 September 2005

7 f. attend weekly Nurse Recovery Group meetings for June - July 2005, and August -  
8 September 2005

9 g. submit AA/NA attendance forms for April - May 2005, June - July 2005, and  
10 August - September 2005

11 h. submit to required, random drug screens on May 10, 2005, May 29, 2005, June 7,  
12 2005, June 13, 2005, June 29, 2005, July 8, 2005, July 27, 2005, August 9, 2005, August 22, 2005,  
13 August 30, 2005, September 7, 2005, and September 9, 2005

14 i. submit letters from her Nurse Recovery Group facilitator and AA/NA sponsor that  
15 she discussed her relapse with them.

16 13. On or about October 24, 2005, Respondent was discharged from CANDO.

### 17 CONCLUSIONS OF LAW

18 1. The conduct and circumstances alleged in the Findings of Fact constitute violations of  
19 A.R.S. § 32-1663(D) as defined in A.R.S. § 32-1601(d), (h), (i), and (j) and A.A.C. R4-19-403(12).

20 2. The conduct and circumstances described in the Findings of Fact constitute sufficient  
21 cause pursuant to A.R.S. § 32-1664 (N) to suspend or revoke the license of Amanda Lynn Laschet to  
22 practice as a professional nurse in the State of Arizona.

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Order:

SEAL

Greg Redenroth Rn Rn Rn

Joey Ridenour, R.N., M.N.  
Executive Director

1 COPIES mailed this 3<sup>rd</sup> day of February 2006, by Certified Mail No. 7001 1940 0003 4511 3759 and  
2 First Class Mail to:

3 Amanda Lynn Laschet  
4 4800 S Alma School Rd #1107  
5 Chandler AZ 85248

6 COPIES of the foregoing mailed this 3<sup>rd</sup> day of February 2006, to:

7 Daniel R. Christl  
8 Assistant Attorney General  
9 1275 W Washington  
10 Phoenix AZ 85007

11 By: Vicky Driver  
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ARIZONA STATE BOARD OF NURSING  
1651 East Morten Avenue, Suite 210  
Phoenix, Arizona 85020  
602-889-5150

IN THE MATTER OF PROFESSIONAL NURSE  
LICENSE NO. RN132552  
ISSUED TO:

AMANDA LYNN LASCHET,

Respondent.

NOTICE OF BOARD CONSIDERATION  
OF STATE'S MOTION TO DEEM  
ALLEGATIONS ADMITTED AND  
RECOMMENDED DISCIPLINE

CASE NO. 0510049

The Arizona State Board of Nursing gives notice that the Board will consider the State's Motion to Deem Allegations Admitted and Recommended Discipline, and your Response to the Motion, if any, on January 25, 2006, which begins at 9:00 a.m., at the Arizona State Board of Nursing Conference Room, 1651 E. Morten Avenue, Suite 210, Phoenix, Arizona. The Board may accept, reject or modify any recommended discipline presented for consideration. You may appear before the Board in person or through counsel at that time. For answers to questions regarding the Motion to Deem and Recommended Discipline, contact Susan Barber, R.N., M.S.N., at (602) 889-5161.

DATED this 10<sup>th</sup> day of January 2006.

SEAL

ARIZONA STATE BOARD OF NURSING



Joey Ridenour, R.N., M.N.  
Executive Director

COPIES mailed this 10<sup>th</sup> day of January 2006, by Certified Mail No. 7001 1940 0003 4511 3339 and First Class Mail to:

Amanda Lynn Laschet  
4800 S Alma School Rd #1107  
Chandler AZ 85248

By: Vicky Driver

1 TERRY GODDARD  
2 Attorney General  
3 Firm Bar No. 14000

4 DANIEL R. CHRISTL  
5 Assistant Attorney General  
6 State Bar No. 13496  
7 1275 W Washington/LES  
8 Phoenix AZ 85007  
9 Telephone No. 602-542-1610  
10 Attorneys for the State of Arizona

11  
12 **ARIZONA STATE BOARD OF NURSING**  
13 **1651 East Morten Avenue, Suite 210**  
14 **Phoenix, Arizona 85020**  
15 **602-889-5150**

16 IN THE MATTER OF PROFESSIONAL NURSE  
17 LICENSE NO. RN132552  
18 ISSUED TO:

19 AMANDA LYNN LASCHET,  
20  
21 Respondent.

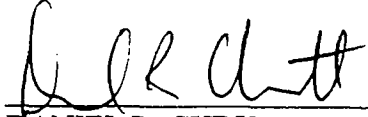
CASE NO. 0510049

22 **MOTION TO DEEM**  
23 **ALLEGATIONS ADMITTED**  
24 **AND RECOMMENDED DISCIPLINE**

25 Pursuant to A.R.S. § 32-1663(G)(3), the State, by and through the undersigned Assistant  
26 Attorney General, submits its Motion to Deem Allegations Admitted and its recommendation to the  
27 Board for the imposed discipline upon the license. The basis for this motion is set forth in the attached  
28 Memorandum of Points and Authorities.

29 Respectfully submitted this 10<sup>th</sup> day of January 2006.

TERRY GODDARD  
Attorney General

30  
31   
32 DANIEL R. CHRISTL  
33 Assistant Attorney General

1 MEMORANDUM OF POINTS AND AUTHORITIES

2 Arizona Revised Statute § 32-1663(G)(3) provides that unless the licensee or certificate holder  
3 submits a written request for a hearing within thirty days after service of the Notice by certified mail,  
4 the Arizona State Board of Nursing ("Board") may consider the allegations admitted and may take any  
5 disciplinary action allowed without conducting a hearing.  
6

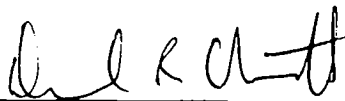
7 In the present case, the Board served Notice of Charges, via certified mail number 7005 0390  
8 0004 8513 2382 and first class mail on November 17, 2005 to 4800 South Alma School Road #1107,  
9 Chandler Arizona 85248, Respondent's address of record with the Board.  
10

11 Respondent failed to request a hearing within 30 days after the Notice of Charges was served as  
12 required by A.R.S. § 32-1663(G)(3). Therefore, the State respectfully requests that the Board deem  
13 Respondent's admission to the allegations stated in the Notice of Charges.  
14

15 The State recommends that the Board impose an order of **REVOCATION** upon the license for  
16 the following reasons: (1) positive drug screen for methamphetamine; and (2) non-compliance with a  
17 stipulated agreement.

18 Respectfully submitted this 10<sup>th</sup> day of January 2006.  
19

20 TERRY GODDARD  
21 Attorney General

22   
23 DANIEL R. CHRISTL  
24 Assistant Attorney General

25 ORIGINAL filed this 10<sup>th</sup> day of January 2006, with  
26 Arizona State Board of Nursing  
27 1651 E Morten Ave Ste 210  
28 Phoenix AZ 85020  
29

COPIES mailed this 10<sup>th</sup> day of January 2006, by Certified Mail No. 7001 1940 0003 4511 3339  
and First Class Mail to:

Amanda Lynn Laschet  
4800 S Alma School Rd #1107  
Chandler AZ 85248

By: Vicky Driver

1 ARIZONA STATE BOARD OF NURSING  
2 1651 East Morten Avenue, Suite 210  
3 Phoenix, Arizona 85020-4613  
4 602-889-5150

5 IN THE MATTER OF THE PROFESSIONAL  
6 NURSE LICENSE NO.: RN132552  
7 ISSUED TO:  
8 AMANDA LYNN LASCHET  
9 RESPONDENT

NOTICE OF CHARGES  
CASE NO. 0510049

10 The Arizona State Board of Nursing ("Board") has sufficient evidence of the conduct  
11 described in the factual allegations that, if not rebutted or explained, justifies disciplinary action  
12 pursuant to A.R.S. §§ 32-1601 to -1667.

13 FACTUAL ALLEGATIONS

14 1. Amanda Lynn Laschet ("Respondent") holds Board issued professional nurse  
15 license no. RN032552.

16 2. The Board has authority pursuant to A.R.S. §§ 32-1606, 32-1663, and 32-1664 to  
17 impose disciplinary sanctions against the holders of nursing licenses for violations of the Nurse  
18 Practice Act, A.R.S. §§ 32-1601 to -1667.

19 3. On or about March 17, 2005, the Board voted to grant licensure to Respondent and  
20 accepted her signed Stipulated Agreement, which required, in part that she undergo a chemical  
21 dependency evaluation within 30 days, enroll in a drug screening program within seven days of  
22 entering the CANDO program and submit to required monthly random drug screens, attend two AA  
23 meetings per week, abstain from the use of alcohol and narcotics, abstain from unauthorized drug use,  
24 notify CANDO of any prescription received, notify CANDO of any inability to screen, and upon  
25 return to nursing practice, abide by standard nursing practice restrictions.  
26  
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1           4. On or about May 2, 2005, Respondent submitted a drug screen that was positive for  
2 methamphetamines.

3  
4           5. On or about May 10, 2005, Board staff interviewed Respondent, who stated that  
5 three days prior to the positive drug screen her husband left her to take a job in South Africa. While  
6 going through some boxes that her husband had packed prior to their move to Arizona, she found the  
7 methamphetamines that she had placed among her clothes several years prior. She said she was  
8 angry with her husband about leaving her in Arizona with their two-year-old daughter. Respondent  
9 admitted to using the methamphetamines and to losing the focus of her recovery.  
10

11           6. Board staff also discussed Respondent's non-compliance with the Stipulated  
12 Agreement, failing to attend two AA/NA meetings per week and attend Nurse Recovery Group  
13 weekly. Respondent stated that she had been hospitalized several times in the previous few weeks for  
14 kidney stones and had been too ill to attend any meetings. Respondent stated that she had her  
15 chemical dependency evaluation conducted on May 3, 2005, but had failed to disclose to the evaluator  
16 that she had relapsed the day before the evaluation.  
17  
18

19           7. On or about May 10, 2005, Respondent signed the relapse addendum, which  
20 required, in part, that she abstain from the use of alcohol and narcotics, undergo a relapse prevention  
21 evaluation within seven days, submit to random drug screens twice per month for six months, attend  
22 90 AA meetings in 90 days, no access to narcotics for six months and refrain from working in nursing  
23 until she receive authorization from the CANDO consultant.  
24

25           8. On or about July 28, 2005, Board staff spoke to Respondent regarding her non-  
26 compliance with the Stipulated Agreement and the relapse addendum. Respondent stated that she did  
27 see the evaluator that conducted the initial evaluation but did not like his recommendations. She  
28 stated that she returned to New Mexico and attended an intensive outpatient program, Focus  
29

1 Recovery. Board staff also discussed Respondent's failure to notify CANDO that she was unable to  
2 submit to drug screens since she was in New Mexico, had not submitted to two drug screens per  
3 month, and had not started attending the 90 AA/NA meetings in 90 days, all of which were required.  
4 Respondent was asked to submit a letter from Focus Recovery regarding her attendance at the  
5 program, a copy of her medical records for all of her hospitalizations, a letter from her sponsor and  
6 Nurse Recovery Group facilitator that she had discussed her relapse with them and to comply with all  
7 the conditions of the Stipulated Agreement and relapse addendum.  
8  
9

10 9. On or about September 22, 2005, Respondent was scheduled to meeting with Board  
11 staff regarding her non-compliance with the Stipulated Agreement and relapse addendum. On that  
12 day, Respondent called from Belgium, she said her husband was currently in the hospital.  
13 Respondent was due to return to the United States on September 30, 2005, and agreed to contact  
14 Board staff on October 3, 2005.  
15

16 10. On or about October 3, 2005, Respondent failed to contact Board staff.  
17

18 11. On or about October 19, 2005, Board staff left a voice message on Respondent's  
19 phone to contact the Board. Respondent failed to contact Board staff.  
20

21 12. According to CANDO records, Respondent failed to:

- 22 a. submit the Employment Acknowledgement form from her nursing supervisor
- 23 b. notify CANDO and the lab of her inability to submit to drug screens
- 24 c. notify CANDO of any hospitalizations or procedures where medications are  
25 administered
- 26 d. submit performance evaluations for March 2005, April - May 2005 and June-  
27 July 2005  
28  
29

1 e. submit Self-Report forms for April – May 2005, June – July 2005, and August –  
2 September 2005

3 f. attend weekly Nurse Recovery Group meetings for June – July 2005, and August  
4 – September 2005

5 g. submit AA/NA attendance forms for April – May 2005, June – July 2005, and  
6 August – September 2005

7 h. submit to required, random drug screens on May 10, 2005, May 29, 2005, June  
8 7, 2005, June 13, 2005, June 29, 2005, July 8, 2005, July 27, 2005, August 9, 2005, August 22, 2005,  
9 August 30, 2005, September 7, 2005, and September 9, 2005

10 i. submit letters from her Nurse Recovery Group facilitator and AA/NA sponsor  
11 that she discussed her relapse with them.

12 13. On or about October 24, 2005, Respondent was discharged from CANDO.

13  
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16 **ALLEGED VIOLATIONS**

17 1. The conduct and circumstances alleged in the Factual Allegations alleged constitute  
18 violations of A.R.S. § 32-1663(D) as defined in A.R.S. § 32-1601(d), (h), (i), and (j) and A.A.C. R4-  
19 19-403(12).

20 WHEREFORE, the Arizona State Board of Nursing alleges that grounds exist that, if  
21 proven, would constitute a basis to impose disciplinary sanctions pursuant to A.R.S. §§ 32-1606, 32-  
22 1663, and 32-1664.

23 Pursuant to A.R.S. § 32-1663(G), Respondent shall file with the Board a written request  
24 for hearing within 30 days after service of this Notice of Charges to Susan Barber, MSN, RN, at  
25 Arizona State Board of Nursing, 1651 E. Morten, Suite 210, Phoenix, AZ 85020. **THE BOARD**  
26 **SHALL CONSIDER RESPONDENT'S FAILURE TO REQUEST A HEARING WITHIN**  
27  
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29

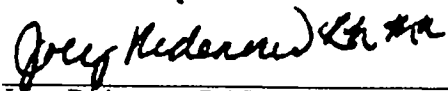


1 THIS TIME AS RESPONDENT'S ADMISSION BY DEFAULT TO THE ALLEGATIONS  
2 STATED IN THE NOTICE OF CHARGES. The Board may then take action provided by A.R.S.  
3 § 32-1663 (D) without conducting a hearing. For answers to questions regarding the Notice of  
4 Charges, contact Susan Barber at (602) 889-5161.  
5

6 The Board may take whatever disciplinary action is deemed appropriate, pursuant to  
7 A.R.S. §§ 32-1606, 32-1663, and 32-1664.  
8

9 Dated this 17th day of November 2005.  
10

11 SEAL

12   
13 Joey Ridenour, R.N., M.N.  
14 Executive Director

15 JR/SS/oz

16 COPIES mailed this 17th day of November 2005, by Certified Mail No. 7005 0390 0004 8513 2382  
17 and First Class Mail to:

18 Amanda Lynn Laschet  
19 4800 South Alma School Road, #1107  
20 Chandler, AZ 85248

21 By: Olga Zuniga  
22 Administrative Secretary  
23  
24  
25  
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29

## ARIZONA STATE BOARD OF NURSING

IN THE MATTER OF PROFESSIONAL )  
NURSE LICENSE NO.: RN132552 )  
ISSUED TO: )  
AMANDA LYNN LASCHET )  
\_\_\_\_\_ )

**FIRST ADDENDUM TO  
STIPULATED AGREEMENT  
FOR TREATMENT  
REHABILITATION, AND  
MONITORING OF  
CHEMICAL DEPENDENCY  
CASE NO. 0502049**

I, Amanda Lynn Laschet, License No. RN132552, do admit to having relapsed on or about April 30, 2005. I agree to the following additional conditions to my original contract dated March 17, 2005 in order to remain in the CANDO Program with the Arizona State Board of Nursing:

1. To continue participating in the CANDO program for three (3) years as of May 10, 2005.
2. I agree to undergo a relapse evaluation within seven days by an individual who specializes in diagnosing and treating chemical dependency. I agree to execute the appropriate release of information form, to allow the evaluator to communicate with the CANDO Program. I agree to cause the evaluator to submit a written report to the CANDO Program. The report should include a history of substance abuse, past treatment, present status of recovery and participation in recovery activities, and recommendations for on-going treatment. If the evaluator recommends that I complete relapse prevention therapy or any other form of treatment, I agree to begin participation in a approved program within seven days of the CANDO Program's receipt of the evaluation. I understand that I must satisfactorily complete any and all recommendations made by the evaluator. I will cause the therapist to submit to the CANDO Program in writing on letterhead, verification of my enrollment into the program. Thereafter, I shall cause the therapist to submit on CANDO approved form, evidence of satisfactory

attendance, participation and successful completion. Such reports are due according to schedule, as identified in my original CANDO Agreement.

3. I agree to submit to a minimum of two (2) urine drug screens per month for six (6) months, and a minimum of one (1) urine drug screen per month thereafter, upon receiving written authorization from CANDO.

4. I agree to as of this date, attend a minimum of one AA/NA meeting per day for the next 90 days and to submit monthly documentation of my 12-step attendance to CANDO. Thereafter, I agree to attend a minimum of three (3) AA/NA, or other 12-step program meetings per week and document attendance.

5. I agree to obtain and maintain my AA/NA sponsor for the remainder of my contract.

6. I agree to have my sponsor write a letter to CANDO stating I have discussed my relapse with her. I agree that CANDO will receive this letter within seven (7) days.

7. I agree to attend weekly a nurse recovery group for the remainder of my contract.

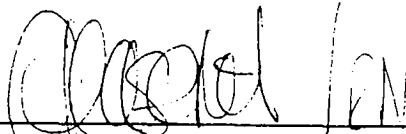
8. I agree to have my nurse recovery group facilitator write a letter to CANDO stating I have discussed my relapse with the group. I agree that CANDO will receive this letter within seven (7) days.

9. I agree to not return to the practice of nursing until I have received written authorization from CANDO.

10. I agree to not administer or have access to controlled substance medications for a minimum of six (6) months and until receiving a letter stating otherwise from CANDO.


11. I agree to submit a copy of this addendum to any nursing employers. The employer shall acknowledge, in writing, receipt of the addendum.

All other terms of the original agreement dated March 17, 2005 remain in full effect.

  
\_\_\_\_\_  
Licensee: Amanda Lynn Laschet  
Dated: 5/10/05

ARIZONA STATE BOARD OF NURSING

SEAL

  
\_\_\_\_\_  
Joey Ridenour, R.N., M.N.  
Executive Director

Dated: May 10, 2005

JR/SS/oz

**CANDO PROGRAM  
ARIZONA STATE BOARD OF NURSING  
CONFIDENTIAL STIPULATED AGREEMENT**

Pursuant to A.R.S. §32-1605.01(B)(6) and §32-1606(A)(5), the Arizona State Board of Nursing, through its executive director, has authority to enter into the following agreement and pursuant to A.R.S. §32-1663, as defined in A.R.S. §32-1601(16)(k), has authority to enforce the following agreement.

I, Amanda Lynn Laschet, License No. RN132552, agree to participate in CANDO, the Arizona State Board of Nursing's ("Board") confidential, nondisciplinary monitoring program for chemically dependent nurses. I have voluntarily chosen to participate in CANDO and agree to adhere to the following conditions set forth in this agreement:

1. To participate in CANDO for a minimum period of two years.
2. To completely abstain from the use of alcohol and all other mind/mood altering medications and controlled and/or addictive substances.
3. To enter within fourteen (14) calendar days a Arizona Department of Health Services licensed and Board acceptable chemical dependency treatment program. I agree to abide by all recommendations of that program regarding ongoing treatment and discharge planning. Documentation of name of program, therapist and/or counselor, date of entry, attendance, progress, completion, and recommendations must be submitted to CANDO. **WAIVED**
4. To refrain from the practice of nursing until CANDO has received a recommendation to return to work from the medical director or equivalent of the chemical dependency treatment program and CANDO has approved my re-entry into nursing. **WAIVED**
5. Within seven (7) calendar days of the completion of the intensive phase of the treatment program, enter an Arizona Department of Health Services licensed and Board acceptable aftercare program facilitated by the original chemical dependency treatment program. The aftercare program must be a minimum of six (6) months in length. A CANDO provided aftercare report must be submitted to CANDO by the last day of my reporting months. In addition, a letter documenting successful completion must be submitted to CANDO by the aftercare program. **WAIVED**
6. To be evaluated by a Board acceptable chemical dependency therapist within 30 days of my entry into CANDO to identify any deficiencies in my recovery program. I agree to abide by his/her recommendations which may include ongoing counseling.
7. To attend a minimum of two (2) Alcoholics Anonymous or equivalent program meetings each week and to submit the CANDO provided attendance sheet by the last day of my reporting months. I will also obtain a sponsor within sixty (60) days of entering CANDO and maintain a relationship with a sponsor during my participation in CANDO.
8. To attend weekly a Board acceptable nurse recovery group. If there is no group within forty (40) miles of my home, I will attend an additional Alcoholics Anonymous or equivalent meeting each week.
9. To submit a complete CANDO provided self-report form to CANDO by the last day of my reporting months.

10. To select one health care provider for my health care needs and to immediately submit to him/her the CANDO provided health care provider form describing CANDO, the drug restrictions, and the required documentation if any medications are prescribed either currently or at any time while participating in CANDO. Additionally, I agree to notify any and all health care providers, that I receive treatment from, of my participation in CANDO prior to receiving treatment. If my health care provider prescribes a narcotic or mood altering medication, I shall ensure that the prescribing provider notifies CANDO immediately and submits monthly reports to CANDO regarding the continued need for the narcotic or mood-altering medication.
11. To refrain from taking any medication (except for ibuprofen, plain aspirin and/or acetaminophen) unless I have obtained a written authorization from my health care provider. I will maintain a log of all medications taken including ibuprofen, plain aspirin and acetaminophen, and will submit the log to CANDO by the last day of my reporting months. The log shall include the following information: the medication taken; the date and time the medication was taken; the name of the authorizing health care provider; the reason for the medication.
12. To immediately notify CANDO if I am hospitalized or must undergo any procedures requiring the administration of medication, and to provide all required documentation from any and all health care providers.
13. To enroll within seven (7) days in a program for random drug screens that meets the NIDA guidelines and to submit to the screens as required by CANDO. Any confirmed positive drug screen for which CANDO has not received appropriate notification and documentation from the prescribing provider will be considered a relapse. My employer will be notified immediately. I will be re-evaluated for continued participation in CANDO. If it is a second relapse. I understand I will be discharged from CANDO.
14. To give prior notification of any inability to screen to the lab and CANDO. If I fail to notify CANDO and the laboratory of my inability to screen and fail to screen, I will be considered noncompliant with CANDO.
15. To notify within five (5) calendar days CANDO and the lab of any change in my home and/or employment phone number and/or address.
16. To report immediately to CANDO any relapse. Relapse is any actual use of mood or mind altering chemicals including alcohol.
17. To immediately cease practice of nursing if I relapse. Upon a relapse, I understand that I may not return to the practice of nursing until I have received written approval from CANDO.
18. To inform any and all nursing employers and/or schools of nursing of my participation in CANDO and to provide a copy of my Agreement to them and my assigned supervising nurse before accepting any clinical nursing assignment or working in a capacity requiring my nursing license. The employer/my supervisor and/or school of nursing shall submit to CANDO the completed CANDO provided form which documents my work status and ability to comply with all work restrictions.
19. To notify CANDO of any change in my employment status within five (5) calendar days of the change.

20. To have my direct supervisor complete the CANDO provided performance evaluation form in time to allow for the reports to be received by CANDO by the last day of my reporting months.
21. To observe the following work restrictions:
- a) Will not work registry, traveling nurse, nursing float pool, or any temporary employment agency work and will not work in a home or other community based settings in which direct supervision is not available.
  - b) Will work in a setting where there is always a minimum of one other registered nurse.
  - c) Will only work the day or evening shift.
  - d) Will not work more than forty (40) scheduled hours of work in one week.
  - e) Will not work a shift within twelve (12) hours of the previous shift.
  - f) Will not work more than three (3) 12-hour shifts consecutively.
  - g) Will work in an area where there is consistent supervision provided by primarily one (1) individual who has been provided a copy of my Agreement. In the event that the assigned supervising nurse is no longer responsible for the supervision required by this paragraph, I shall cause my new supervising nurse to inform the CANDO Program, in writing and on employer letterhead, acknowledgment of the new supervisor's receipt of a copy of this Agreement and to include the new supervising nurse's ability to comply with the work related restrictions within ten days of assignment of a new supervising nurse.
  - h) May float only when no reasonable alternative exists and the receiving area has knowledge of the Licensee's participation in CANDO.
  - i) Will not have access to or dispense narcotics, synthetic narcotics including but not limited to Ultram, Nubain and Stadol, or other potentially addictive medications for a minimum of zero (0) months. I agree to abide by this restriction until I have been evaluated by and receive written authorization from CANDO.
  - j) Will not accept a new supervisory position for one (1) year.
22. To sign all release of information forms relevant to my treatment and health care.
23. Signing this agreement authorizes communication between CANDO and the identified employer and direct supervisor, and between CANDO and my treatment providers.
24. To appear in person for any requested interviews, given reasonable notice by CANDO.
25. My reporting months (the last day of every other month) while participating in CANDO are as follows:

**March, May, July, September, November and January.**

I understand any and all expenses incurred while I am a participant in CANDO are my responsibility.

I agree to apply for renewal of my license in the event that my license is scheduled to expire while this Stipulated Agreement is in effect. I understand I must pay the applicable fee and maintain qualifications to practice nursing in Arizona.

I agree to inform the CANDO Program, in writing, of a pending relocation out of the State of Arizona, and agree to notify the Board of Nursing, in the state in which relocation to practice nursing is considered, that I am a participant in the Arizona Board of Nursing's nondisciplinary program. I understand that I must fully comply with the terms of this Agreement, regardless of residency. I understand that while participating in CANDO, I am not eligible for a multistate "Compact" license.

I understand that if at any time during my participation in CANDO, a complaint against my license is received by the Board, my participation in CANDO will be communicated to the Board for the Board's review in consideration of the complaint.

I understand that participation in CANDO is voluntary.

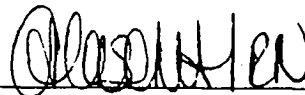
I understand that if I am noncompliant with the terms of this stipulated agreement in any respect, the CANDO Consultant may notify my employer of the noncompliance. Additionally, if I am noncompliant with any of the terms of the agreement, the length and terms of the agreement may be extended and/or modified, or I may be discharged from CANDO.

I understand that noncompliance with any of the terms of the Stipulated Agreement is considered a violation of the Nurse Practice Act. If terminated/discharged from this Agreement for noncompliance, any misconduct which may have occurred prior to the execution of this Stipulated Agreement or while this Agreement is in effect may be used in disciplinary proceedings by the Arizona State Board of Nursing (if I am discharged for noncompliance). Additionally, I understand that if discharged for noncompliance, all records of my participation in this program are no longer confidential or exempt from public records law. The Arizona State Board of Nursing may summarily suspend my nursing license if there is an immediate threat to the public health and safety. I further understand that Arizona State Board of Nursing disciplinary actions are reportable to the National Council of State Boards of Nursing Data Bank.

I hereby certify I have read this document, have had an opportunity to ask questions and I understand the agreement. Any modifications to the terms of this stipulated agreement are subject to the approval of the CANDO Consultant and must be documented in an addendum and signed by the Licensee and the Executive Director.



Joey Ridenour, R.N., M.N.  
Executive Director



Licensee: Amanda Lynn Laschet  
License No.:

Date: 3/17/2005

Date: 3/15/05

SEAL

SS